## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

NATASHA DELIMA,

Plaintiff,

v.

YOUTUBE, INC. ET AL.,

Defendants.

Civil No. 17-CV-733-PB

Declaration of Ryan T. Mrazik in Support of Defendants Google LLC, Twitter, Inc., and YouTube, LLC's Joint Motion to Dismiss or, in the Alternative, to Transfer Venue

## I, Ryan T. Mrazik, hereby declare as follows:

- 1. I am over eighteen and I am duly licensed to practice before the courts of the State of Washington. I am an attorney for Google LLC ("Google"), Twitter, Inc. ("Twitter"), and YouTube, LLC ("YouTube") (collectively, "Defendants") in this action. I have personal knowledge of fact below. If called upon to testify, I could and would testify competently as to the matters contained herein.
- 2. Attached as **Exhibit A** is a true and correct copy of Google's Terms of Service. It, as well as prior versions, are available at <a href="https://policies.google.com/terms">https://policies.google.com/terms</a>. The forum selection clause therein has been the same or similar in prior versions since that dated April 16, 2007.
- 3. Attached as **Exhibit B** is a true and correct copy of YouTube's Terms of Service. It is available at <a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>. That version is dated June 9, 2010.
- 4. Attached as **Exhibit C** is a true and correct copy of Twitter's Terms of Service. It, as well as prior versions, are available at https://twitter.com/en/tos. The forum selection clause therein has been the same or similar in prior versions since that dated September 10, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this \_\_15 \_ day of \_\_\_\_, 2018 in Seattle, Washington.

/s/ Ryan T. Mrazik Ryan T. Mrazik